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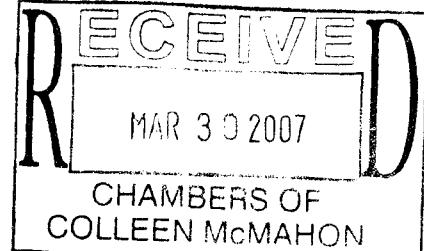
VIA FACSIMILE

4/3/07

March 30, 2007

Hon. Colleen McMahon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 640
New York, New York 10007

*I am
not prepared
to let the draft
letter go forward
at this time
4/3*

Re: Netsoft USA, Inc. v. Incremax Technologies Corporation
Kerry Gerontianos and Louis Giuffre, 06-CV-14348


Dear Judge McMahon:

We represent Defendants Incremax Technologies Corporation and Kerry Gerontianos (the "Incremax Defendants"). Plaintiff Netsoft USA, Inc. ("Netsoft") and the Incremax Defendants jointly request that (a) the Incremax Defendants' time to respond to complaint be extended to and including June 4, 2007, as set forth in the signed, enclosed stipulation, and (b) the conference scheduled on April 13, 2007 at 10 a.m. in White Plains, New York be adjourned for approximately sixty (60) days. Kevin Doherty, Esq., counsel to Netsoft, joins in this request.

Netsoft and the Incremax Defendants make this second request because they are involved in settlement discussions and wish to focus their efforts on trying to resolve the matter without litigation. Further, Defendant Louis Giuffre has not yet been served with the complaint. The United States Attorneys' Office for the Southern District of New York, which filed a criminal complaint (06 Mag 1743) in December 2006 against Mr. Giuffre, is conducting an ongoing criminal investigation that relates to this action.

The Incremax Defendants and Netsoft respectfully request that the conference be adjourned and the stipulation be so ordered. Thank you.

Respectfully submitted,



M. William Munno

caw
Enclosure

cc: Kevin M. Doherty, Esq.

Attorneys for Plaintiff Netsoft USA, Inc. (By Facsimile (845) 638-2707)

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DOCUMENT
ELECTRONICALLY FILED
DATE: 4/3/07
DATE FILED:

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NETSOFT USA, INC.,

X

Plaintiff,

06-CV-14348 (CM)

v.

INCREMAX TECHNOLOGIES CORPORATION,
KERRY GERONTIANOS, and LOUIS GIUFFRE,

STIPULATION AND
ORDER

Defendants.

X

IT IS HEREBY STIPULATED AND AGREED that the time for Defendants
Incremax Technologies Corporation and Kerry Gerontianos to answer, move or otherwise
respond to the Complaint in this action be and hereby is extended from April 4, 2007, to and
including June 4, 2007.

Dated: March 30, 2007

GREENWALD DOHERTY LLP

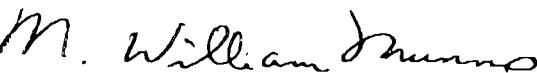
By: 

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Gerontianos

So Ordered

Hon. Colleen McMahon, U.S.D.J.